

010-00 0100-12113
Date a Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # 02-78-0336

PART 1. GENERAL INFORMATION

U.S. EPA I.D. # OH D020632498

Facility: EMC Assembly Div. Address: 2300 Hallock-Young Rd City: Twinsburg
State: Ohio Zip Code: 44482 County: Trumbull Telephone: (216) 841-5512

INSPECTION PARTICIPANTS(S)

	(Name)	(Title)	(Telephone)
1.	<u>Ben Kristan</u>	<u>Mech. Engineer</u>	<u>(216) 841-5211</u>
2.	<u>Phil Dean</u>	<u>Mech. Engineer</u>	<u>" "</u>
3.			

INSPECTOR(S)

1.	<u>Steve Turkerman</u>	<u>Environmental Scientist</u>	<u>(216) 425-9171</u>
2.		<u>Ohio EPA</u>	
3.			

INSTALLATION ACTIVITY

Mark One

- ☐ Generator only (G)
- ☐ Transporter (T)
- ☐ TSDF only
- ☐ G-T
- ☒ G-TSDF
- ☐ T-TSDF
- ☐ G-T-TSDF

If the site is a TSDF, check the boxes indicating which regulations are applicable.

- | | |
|--|---|
| <input checked="" type="checkbox"/> General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure | <input type="checkbox"/> Waste Piles S03 |
| <input checked="" type="checkbox"/> Containers S01 | <input type="checkbox"/> Land Treatment D81 |
| <input checked="" type="checkbox"/> Tanks S02/T01 | <input type="checkbox"/> Landfills D80 |
| <input checked="" type="checkbox"/> Surface Impoundments S04/T02 | <input type="checkbox"/> Chemical/Physical/Biological T04 |
| <input type="checkbox"/> Incineration/Thermal Treatment | <input type="checkbox"/> Groundwater Monitoring |
| | <input type="checkbox"/> Post-Closure |

Part

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PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1.1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>2.1</u>
2.2 Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 (statutory exclusions) or Section 261.6 (recycle/reuse)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>2.2</u>
4.4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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NOTE : SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, PART 2. GENERATOR REQUIREMENTS

- 2.1 Wastes appear to be adequately identified. However, there also appears to be a significant lag time from when wastes are first generated & when they are identified.
- 2.2 The WWTP treats wastes which produce F006. The WWTP has a NPDES permit.

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PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention

D: Contingency and Emergency
E: Manifest/Records/Reporting

G: Closure
H: Financial Requirements

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the wastematerial containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>4.1, 2.1</u>
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Section 265.13(b)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. a) Physical contact with the waste structures or equipment will not injure unknowing/unauthorized persons or livestock entering the facility (265.14(a)(1)).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Disturbance of the waste will not cause a violation of the hazardous waste regulations (265.14(a)(2)).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
IF <u>BOTH</u> 3a AND 3b ARE "YES", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
4. The facility has -				
a) A 24-hour surveillance system, <u>or</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) An artificial or natural barrier <u>and</u> a means to control entry at all times (265.14(b)(2)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)
 - a) Internal alarm system.
 - b) Access to telephone, radio or other device for summoning emergency assistance.
 - c) Portable fire control equipment.
 - d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33)
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34)
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35)
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a))
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b))

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

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Yes No N/A Remark #

Subpart E: Manifests/Records/Reporting

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 which contains the following information:
 - a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal. (262.73(b)(1))
 - b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
 - c) The estimated (or actual) weight, volume or density of the waste material(s).
 - d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).
 - e) The present physical location of each hazardous waste within the facility.
 - f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2))
 - g) Records of any waste analyses and trial tests required to be performed.
 - h) Records of the inspections required under Section 265.15 (General Inspection Requirements - Subpart B).
 - i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6).
 - j) Records of Closure cost estimates and ~~Post-Closure~~ (DISPOSAL ONLY) cost estimates required under Subpart G.

_____	✓	_____	4.4
✓	_____	_____	_____
_____	✓	_____	_____
✓	_____	_____	_____
✓	_____	_____	_____
_____	_____	✓	_____
✓	_____	_____	_____
✓	_____	_____	_____
✓	_____	_____	_____

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A description of how any of the applicable closure requirements in other Subparts of Section 265 (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
d) A description of steps taken to decontaminate facility equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
e) The year closure is expected to begin and a schedule for the various phases of closure.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____

Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143)				
a) A closure trust fund, or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
b) A surety bond, or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
c) A closure letter of credit, or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
d) A combination of financial mechanisms.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____

NOTE : COMPLIANCE WITH THESE REGULATIONS IS A FEDERAL REQUIREMENT.

e) Financial test

☒ ☐ ☐ _____

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PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173)		✓		
b) In good physical condition (265.171)		✓		
c) Compatible with the wastes stored in them (265.172)	✓			
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a))		✓		
3. Hazardous waste containers are not stored, handled or opened in a manner which may rupture the container or cause it to leak. (265.173(b))	✓			
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174)	✓			
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).	✓			
6. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner. (265.177(c))	✓			

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Subpart K: Surface Impoundments

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The Surface Impoundment is designed to operate with at least 2 feet (60 cm.) of freeboard and has a structural containment system adequate to contain the waste material (Section 265.222).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
2. Earthen structural containment systems are equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water (265.22).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
3. The level of freeboard in the Surface Impoundment is inspected at least once each operating day, the structural containment system is inspected at least once per week and all such inspections are documented (265.226).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
4. Whenever Surface Impoundments are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the Surface Impoundment, the facility has insured the safety of such changes (265.225).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
5. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in Surface Impoundments the facility has insured the safety of the operation by treating the waste immediately after placement in the Surface Impoundment so that it is no longer Ignitable or Reactive (265.229 and 265.17(b)).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
6. Incompatible materials are never placed in the same Surface Impoundment unless it is done in compliance with the safety requirements of Section 265.17(b) (265.230).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____

NOTE : IF THE OPERATOR ELECTS NOT TO EXEMPT THE SURFACE IMPOUNDMENT FROM FURTHER REGULATION BY REMOVING ALL WASTE MATERIALS, THE SURFACE IMPOUNDMENT IS SUBJECT TO THE POST-CLOSURE CARE AND GROUNDWATER MONITORING REQUIREMENTS SPECIFIED IN SUBPART G FOR DISPOSAL FACILITIES AND SUBPART N, SECTION 265.310 FOR LANDFILLS.
(SECTION 265.228)

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Subpart J: Storage in Tanks

- 1.1 The tank(s) are operated in compliance with the safety requirements of Sections 265.17 and 265.192(b) and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192(d).
- 2.2 Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192(c)).
- 3.3 Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194).
- 4.4 Weekly inspections are made of all tank construction materials and containment structures (265.194).
- 5.5 Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (265.193(a))
- a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.
- b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.
- 6.6 With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods: (265.198(a))
- a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b).

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
_____	_____	<input checked="" type="checkbox"/>	_____
_____	_____	<input checked="" type="checkbox"/>	_____
<input checked="" type="checkbox"/>	_____	_____	_____
<input checked="" type="checkbox"/>	_____	_____	_____
_____	_____	<input checked="" type="checkbox"/>	_____
_____	_____	<input checked="" type="checkbox"/>	_____
_____	_____	<input checked="" type="checkbox"/>	_____

6-MC 140210000

SUBPART F: GROUNDWATER MONITORING

Type of facility: (check appropriately)

- a) surface impoundments
- b) Landfill
- c) land treatment facility
- d) disposal waste pile

<u>Yes</u>	<u>No</u>	<u>Unknown</u>	<u>Waived</u>
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
<input type="checkbox"/>	<input checked="" type="checkbox"/>		
<input type="checkbox"/>	<input checked="" type="checkbox"/>		
<input type="checkbox"/>	<input checked="" type="checkbox"/>		

Ground-water Monitoring Program

1. Was the ground-water monitoring program reviewed prior to site visit?
If "No",

<input checked="" type="checkbox"/>	<input type="checkbox"/>
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a) Was the ground-water program reviewed at the facility prior to site inspection?

<input type="checkbox"/>	<u>NA</u>
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2. Has a ground-water monitoring program (~~capable of determining the facility's impact on the quality of groundwater in the uppermost aquifer underlying the facility~~) been implemented? 265.90(a)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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3. Has at least one monitoring well been installed in the uppermost aquifer hydraulically upgradient from the limit of the waste management area? 265.91(a)(1)

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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a) Are ground-water samples from the uppermost aquifer, representative of background ground-water quality and not affected by the facility (as ensured by proper well number, location and depths?)

<input type="checkbox"/>	<input type="checkbox"/>	<u>see comment</u>	<input type="checkbox"/>
		<u>GOO</u>	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4. Have at least three monitoring wells been installed hydraulically downgradient at the limit of the waste handling or management area? 265.91(a)(2)

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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a) Do well number, locations and depths ensure prompt detection of any statistically significant amounts of HW or HW constituents that migrate from the waste management area to the uppermost aquifer?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<u>Yes</u>	<u>No</u>	<u>Unknown</u>	<u>Waived</u>
5. Have the locations of the waste management areas been verified to conform with information in the ground-water program?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) If the facility contains multiple waste management components, is each component adequately monitored?	<input type="checkbox"/>	<u>NA</u>	<input type="checkbox"/>	<input type="checkbox"/>
6. Do the numbers, locations, and depths of the ground-water monitoring wells agree with the data in the ground-water monitoring system program? If "No", explain discrepancies.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Well completion details. 265.91(c)				
a) Are wells properly cased?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>see 6.01</u>
b) Are wells screened (perforated) and packed where necessary to enable sampling at appropriate depths?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Are annular spaces properly sealed to prevent contamination of ground-water?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Has a ground-water sampling and analysis plan been developed? 265.92(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) Has it been followed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Is the plan kept at the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Does the plan include procedures and techniques for:				
1) Sample collection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2) Sample preservation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3) Sample shipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4) Analytical procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5) Chain of custody control?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>	<u>Waived</u>
9. Are the required parameters in ground-water samples being tested quarterly for the first year? 265.92(b) and 265.92(c)(1)	<u>✓</u>	<u> </u>		
a) Are the ground-water samples analyzed for the following:				
1) Parameters characterizing the suitability of the ground-water as a drinking water supply? 265-92(b)(1)	<u>✓</u>	<u> </u>		
2) Parameters establishing ground-water quality? 265.92(b)(2)	<u>✓</u>	<u> </u>		
3) Parameters used as indicators of ground-water contamination? 265.92(b)(3)	<u>✓</u>	<u> </u>		
(i) For each indicator parameter are at least four replicate measurements obtained at each upgradient well for each sample obtained during the first year of monitoring? 265.92(c)(2)	<u>✓</u>	<u> </u>		
(ii) Are provisions made to calculate the initial background arithmetic mean and variance of the respective parameter concentrations or values obtained from the upgradient well(s) during the first year? 265.92(c)(2)	<u>✓</u>	<u> </u>		
b) For facilities which have completed first year ground-water sampling and analysis requirements:				
1) Have samples been obtained and analyzed for the ground-water quality parameters at least annually? 265.92(d)(1)	<u> </u>	<u> </u>	<u>✓</u>	
2) Have samples been obtained and analyzed for the indicators of ground-water contamination at least semi-annually? 265.92(d)(2)	<u> </u>	<u> </u>	<u>✓</u>	
c) Were ground-water surface elevations determined at each monitoring well each time a sample was taken? 265.92(e)	<u>✓</u>	<u> </u>		
d) Were the ground-water surface elevations evaluated annually to determine whether the monitoring wells are properly placed? 265.92(f)	<u>✓</u>	<u> </u>		

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>	<u>Waived</u>
e) If it was determined that modification of the number, location or depth of monitoring wells was necessary, was the system brought into compliance with 265.91(a)? 265.93(f)	<u>NA</u>			
10. Has an outline of a ground-water quality assessment program been prepared? 265.93(a).	<u>✓</u>			
a) Does it describe a program capable of determining:				
1) Whether hazardous waste or hazardous waste constituents have entered the ground-water?	<u>✓</u>			
2) The rate and extent of migration of hazardous waste or hazardous waste constituents in ground-water?	<u>✓</u>			
3) Concentrations of hazardous waste or hazardous waste constituents in groundwater?	<u>✓</u>			
b) After the first year of monitoring, have at least four replicate measurements of each indicator parameter been obtained for samples taken for each well? 265.93(b)			<u>✓</u>	see 6.2
1) Were the results compared with the initial background means from the upgradient well(s) determined during the first year?			<u>✓</u>	
(i) Was each well considered individually?			<u>✓</u>	
(ii) Was the Student's t-test used (at the 0.01 level of significance)?			<u>✓</u>	
2) Was a significant increase (or pH decrease as well) found in the:				
(i) Upgradient wells			<u>✓</u>	
(ii) Downgradient wells			<u>✓</u>	
If "Yes", Compliance Checklist A-2 must also be completed.				
11. Have records been kept of analyses for parameters in 265.92(c) and (d)? 265.94(a)(1)	<u>✓</u>			

- | | Yes | No | Unknown | Waived |
|--|-------------------------------------|-------------------------------------|-------------------------------------|--------------------------|
| 12. Have records been kept of ground-water surface elevations taken at the time of sampling for each well? 265.94(a)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 13. Have records been kept of required elevations in 265.93(b)?
265.94(a)(1) 265.94(c)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 14. Have the following been submitted to the Regional Administrator Director
265.94(a)(2): | | | | |
| a) Initial background concentrations of parameters listed in 265.92(b) within 15 days after completing each quarterly analysis required during the first year? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) For each well, have any parameters whose concentrations or values have exceeded the maximum contaminant levels allowed in drinking water supplies been separately identified? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Annual reports including: | | | | |
| 1) Concentrations or values of parameters used as indicators of ground-water contamination for each well along with required evaluations under 265.93(b)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2) Any significant differences from initial background values in upgradient wells separately identified? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3) Results of the evaluation of ground-water surface elevations? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Comments: Subpart F

6.0 The District Geologist's comments on the monitoring program (dated 10-21-82) specified additional work to be done. The comments were not directed towards the requirements for RCR 17.

6.01 Wells #2 & #6 cased at ground level, not properly completed

6.02 Lab analysis not available at time of inspection